

EXHIBIT AA

1 THE UNITED STATES DISTRICT COURT
2 FOR THE EASTERN DISTRICT OF MICHIGAN
3 SOUTHERN DIVISION
4 LEAPERS, INC.,
5 (A Michigan Corporation), CIVIL ACTION NO.:
6 Plaintiff, 2:14-CV-12290-RHC-DRG
7 vs. JUDGE ROBERT CLELAND
8 SMTS, LLC d/b/a TUFF ZONE, MAG. JUDGE DAVID GRAND
9 (A Michigan Corporation);
10 TRARMS INC.(A California
11 Corporation); and SUN OPTICS
12 USA,(A Texas Corporation),
13 Defendants.
14 SMTS, LLC d/b/a TUFF ZONE, (A
15 Michigan Corporation), TRARMS,
16 INC., (A California Corporation) and
17 CHUANWEN SHI, a citizen of China,
18 Counter-Plaintiffs,
19 vs.
20 LEAPERS, INC.,(A Michigan Corporation)
21 and CONTINENTAL INCORPORATED, INC.,
22 d/b/a CONTINENTAL ENTERPRISES,
23 (an Indiana Corporation),
Counter-Defendants.

24 DEPOSITION OF
25 HAIQIANG XIE, a/k/a JOHN XIE

1 DATE: March 31, 2015

2 TIME: 9:45 a.m.

3 LOCATION: Honigman Miller Schwartz & Cohn

4 39400 Woodward Avenue, Suite 101

5 Bloomfield Hills, Michigan

6 REPORTED BY: Anne E. Vosburgh, CSR-6804, RPR, CRR

7 LITIGATION SERVICES, 800.330.1112

8 Reference No. 239768

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15 AND TUFF ZONE:

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I N D E X T O E X A M I N A T I O N S

WITNESS: HAIQIANG XIE a/k/a JOHN XIE

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(EXHIBITS RETAINED.)

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Bloomfield Hills
March 31, 2015,
9:45 a.m.

P R O C E E D I N G S

H A I Q I A N G X I E,
(a/k/a JOHN XIE)

Having affirmed to testify truthfully,
was examined and testified as follows.

EXAMINATION

BY MR. WASSOM:

Q We've spoken before the deposition started that
we have a Mandarin translator present. You
should feel free to rely on her to translate if
you don't understand my questions, okay?

A **Okay.**

Q And if you don't understand something I've said
and you want me to clarify, you can ask me as
well.

A **Okay.**

Q Have you ever had your deposition taken before?

A **No.**

1 Q When did you come to the United States?

2 A 1997.

3 Q Do you have any post-secondary education?

4 A I have a bachelor's degree in Xidian University.

5 I also get my master's in Beihan University and

6 master's in computer science at Eastern Michigan

7 University.

8 Q What were your earlier degrees in?

9 A No. China.

10 Q Yes. In China what were those degrees in, what

11 subject?

12 A Electric engineer. I worked in China as -- my

13 first job in China, I'm doing computer

14 programming. And the first job in the states is

15 Leapers, yeah.

16 Q And when were you hired by Leapers?

17 A 2002, around that time frame.

18 Q And what were your responsibilities when you were

19 hired at Leapers?

20 A Doing IT job.

21 Q And were you part-time or full-time?

22 A Full-time.

23 Q And so you did IT for how long at Leapers?

24 A I did IT all the way to 2011 when I left and --

25 yeah.

1 Q And did you do any other job function while you
2 were at Leapers?

3 A Yes. We pick up different area of jobs. We were
4 required to do a number of different jobs.

5 So I did warehouse manager. So I did
6 take care of the warehouse activity sometimes,
7 yeah, and also project coordinator for optics
8 app.

9 Q Project coordinator, what did that involve?

10 A Mostly involving tracking fulfillment status,
11 factory -- manufacturing status. I would say I
12 would assist to update the account for
13 fulfillment status and also do product testing.

14 Q I'll ask you to speak a little bit slower and a
15 little bit louder.

16 A I'm sorry.

17 Q You assisted David with product fulfillment; is
18 that right?

19 A Yeah.

20 Q You mean David Ding?

21 A Yes.

22 Q And product testing?

23 A Yes.

24 Q So fulfillment, that just means filling orders?

25 A Yeah.

1 Q So when a customer places an order you make sure
2 it gets filled?

3 A **Yes. Check with the factory, make sure their**
4 **production schedule is on time.**

5 Q And then product testing is making sure the
6 products work as they're supposed to?

7 A **Yes.**

8 Q When did you first get involved with doing any
9 sort of product-related duties beyond your IT
10 function?

11 A **I don't remember exactly time. My best guess is**
12 **around 2007 or 2008, yeah.**

13 Q So before that 2007/2008 time frame you were
14 doing strictly IT; is that right?

15 A **Sometimes -- I don't remember exactly. Maybe**
16 **helping, sitting here, there.**

17 Q So every once in a while, you might help if you
18 were asked to, but it wasn't part of your job
19 function?

20 A **Yeah.**

21 Q When you assisted David with contacting the
22 factory, which factory was that?

23 A **Wuyang.**

24 Q Did you ever have dealings with the Jinkaijin
25 factory?

1 A Yes. We have communication, same thing, status,
2 things like that. Yeah.

3 Q How often did you communicate with the factory?

4 A I think their orders not much, so, once a while.
5 I don't remember exactly. But we do -- we do
6 testing for their product.

7 Q Did you have any role in designing Leapers'
8 products?

9 A No. Huh-uh.

10 Q Did you have any interaction with David or with
11 others at Leapers who were designing products?

12 MR. LALONE: I'll object. You're
13 asking my client questions without providing
14 foundation as to whether Leapers was designing
15 anything when he was working there, if you can
16 establish foundation.

17 BY MR. WASSOM:

18 Q Were you involved with anyone designing products
19 at Leapers?

20 A No. As to my knowledge, no.

21 Q Is it fair to say that you don't know one way or
22 the other the extent of design activity that
23 happened at Leapers?

24 A As far as I know, we do not have design at
25 Leapers.

1 Q And why do you say that?

2 A The orders at Leapers. I know them, so I didn't
3 see any design -- I would say engineer.

4 So there was one engineer called Eugene
5 Wu, but he's major functions and mounting system
6 and helping David for the new factory in Michigan
7 here. So engineer -- I can think about it. But
8 he's not involved in optics.

9 Q Now, what did Eugene Wu do, did you say?

10 A His major function is in the mounting system,
11 design, all different mounting system, and also
12 he's -- he's helping David do a lot of the -- for
13 the establish manufacturing in Michigan here.

14 Q So when you say you didn't see any design
15 activity going on at Leapers, you mean you didn't
16 see any engineers designing products here in
17 Michigan; is that right?

18 A I mean specifically in optics. We do --
19 Eugene -- they do designing work at -- in the
20 office here for mounting systems, yeah.

21 Q And you're making reference to optics. I haven't
22 asked you anything about optics yet. But you
23 know why we're here, so I'll ask you more
24 specifically to confirm what you're telling me.

25 You're saying you didn't see any

1 Presma?

2 A Only one relation -- we have -- keep in touch,
3 yeah.

4 Q Let me ask you this. Who is Chuanwen Shi?

5 A Chuanwen Shi, as far as I know, he's at Presma.

6 Q Do you know Mr. Shi?

7 A Yes.

8 Q How do you know him?

9 A When I work at Leapers, he's the owner of
10 manufacturing at Wu Yang. And we have
11 communication and I talk to him about status
12 sometimes, ask him to check fulfillment status.
13 He visited state in Leapers. I don't know the
14 time. But he visit headquarters in Michigan.
15 And we met at Leapers headquarters.

16 Q While you were at Leapers?

17 A Yeah.

18 Q Let me ask you this, while you were at Leapers,
19 the extent of your communication with Mr. Shi had
20 to do with product fulfillment; is that right?

21 A Yeah.

22 Q Did you ever talk about any other type of
23 business with him while you were at Leapers?

24 A Sometimes in new products -- when working in new
25 product we do testing, and I ask specific

1 question about design.

2 So he help me a little bit better
3 understanding, yeah. So when we do testing,
4 yeah.

5 Q When you were at Leapers, did you ever have
6 conversation with Mr. Shi about doing business
7 outside of Leapers?

8 A No.

9 Q After you left Leapers, when was the next time
10 you interacted with Mr. Shi?

11 A I don't remember -- I met -- I was at the shot
12 show, yeah. January 2013.

13 Q And you were with Lion Gears at that point?

14 A Yeah.

15 Q What did you talk about?

16 A Asked them did any new product come out, things
17 like that.

18 Q And what was the next interaction you had with
19 him?

20 A I met him 2014 shot show.

21 Q Is that the only interaction you had with him
22 while you were at Lion Gears was at the shot
23 show?

24 A Sometimes we had communication. I know him long
25 time when I work at Leapers. So sometimes I keep

1 in touch, yeah.

2 Q You keep in touch?

3 A Yeah.

4 Q Are you friends?

5 A Not exactly. So sometimes I help with orders and
6 things like that.

7 Q I thought you were only doing IT with Lion Gears?

8 A It's small company. Sometimes, like Leapers,
9 sometimes helping do sales, like I do the shot
10 show. So I do the shot show, too.

11 Q Has Mr. Shi ever talked to you about his
12 relationship with Leapers?

13 A What do you mean?

14 Q Specifically after you left Leapers and worked
15 for Lion Gears, did he ever tell you anything
16 about his business relationship or legal disputes
17 with Leapers?

18 A Not really.

19 Q He never discussed this case with you before
20 today?

21 A He mentioned the case against Leapers, but we
22 don't know any more detail.

23 Q Do you know what this case is about?

24 A Once I get the deposition, so -- notice
25 deposition, Leapers plaintiff so -- and you

1 that company. I never heard of that, too.

2 Q How about this individual, Yongming Sui?

3 A No.

4 Q He also goes by Steve or Steven?

5 A No.

6 Q Sir, you brought this Leapers catalog with you
7 today. Why did you bring this?

8 A The document, the subpoena requested any document
9 related to Leapers scope, Presma scopes, that's
10 in my possession.

11 So I'm assuming that's what I have in
12 design, the catalog design. So I assume that's
13 what I'm required to submit this.

14 Q Thank you. I'm just curious.

15 And this catalog is labeled Spring
16 2002. Is this the only catalog you have?

17 A This the only thing I can find. I usually do the
18 color design. I have the early years. But right
19 now that's all I can find.

20 I did the catalog design at the time.
21 Leapers did not have a designer. So I do IT
22 work. So I help do the catalog design the early
23 years. I keep a copy at home so I know what I
24 did.

25 Q So you designed this catalog?

1 Q Correct.

2 A **Mr. Shi, yeah.**

3 Q That's the same company you were referring to
4 earlier, Mr. Shi, who is a defendant in this
5 civil case? You understand that?

6 A **Yes.**

7 Q Were you doing anything else to investigate
8 Mr. Shi or Wuyang as of August of 2010?

9 A **I don't remember. That's the email that refresh
10 my memory. Other than that, I don't remember.**

11 Q You never conclusively found that Wuyang was ever
12 pirating any scopes, did you?

13 A **No.**

14 Q So there were a couple of instances you mentioned
15 going to China. And I have a document here that
16 I think references one of the trips you took to
17 China with Mr. Ding.

18 I'm going to mark this as Exhibit 162.
19 See if this refreshes your recollection as to the
20 time period.

21

22 (Marked Deposition Exhibit 162; Email
23 Chain, 11/11/10 RE: "No! Concealed
24 Protected Marking.")
25

1 (Re-marked Exhibit 162.)

2 MR. LALONE: Thanks for pointing that
3 out to me, Counsel. I'll hand this back to the
4 witness.

5 BY MR. LALONE:

6 Q So 162 has been handed to the witness.

7 The top of the email thread there is an
8 email from you dated November 11, 2010, to Tina
9 Ding with a RE: line: "No! Concealed Protected
10 Marking."

11 Do you see that email, sir?

12 A Yes.

13 Q And here you talk about your visit with
14 David Ding to Wuyang; is that correct?

15 A Yes.

16 Q And what was the purpose of this meeting?

17 A This meeting, I try to remember -- October --
18 November 11 --

19 I was trying to remember, yeah.

20 I think the time frame, it's right in
21 November, so we try to discuss a new item from
22 the next year. The purpose, most likely we
23 discuss any new item that come out for the next
24 year. But we do -- from email, we do raise the
25 question about what Tina request for about

1 **producing counterfeit.**

2 **We ask that to Mr. Shi and he denied.**

3 Q And Mr. Shi denied making any counterfeit
4 products; is that right?

5 A **Yes.**

6 Q And you were at Mr. Shi's factory in October of
7 2010 with Mr. Ding; is that correct?

8 A **Yes.**

9 Q Did you ever find out during that trip who was
10 selling the alleged counterfeit scopes?

11 A **No.**

12 Q There were a couple of other exhibits that
13 counsel handed to you earlier today.

14 Could you please look at Exhibit 158,
15 which is the November 12th email from yourself to
16 the Davy Lin and Tina Ding.

17 It's addressed to a "Davy". Who is
18 Davy?

19 A **Davy is one of employee. At the time he's the**
20 **one leading the investigation for the**
21 **counterfeit. He do graphic design and also he do**
22 **sales activity.**

23 Q So this is your email to Davy regarding scopes
24 Wuyang is selling; is that correct?

25 A **Yes.**

1 BY MR. LALONE:

2 Q You can answer the question.

3 A **I'm sorry. I don't understand this.**

4 MR. WASSOM: I have to make certain
5 objections for the record. Counsel does, too.
6 That doesn't stop you from answering the
7 question.

8 BY MR. LALONE:

9 Q Isn't it true that as of November 2010 Leapers
10 was not claiming they owned scallops on a scope
11 design?

12 A **Yes.**

13 MR. WASSOM: Asked and answered.
14 Foundation.

15 BY MR. LALONE:

16 Q That's correct? They do not?

17 A **Yes.**

18 Q Did you do anything in response to that email
19 from Tina Ding? Did you do anything in response
20 to "some possible way to distinguish the scopes"?

21 A **No, I didn't.**

22 Q Do you know if anybody at Leapers did anything in
23 response to "some possible way to distinguish the
24 scopes"? Did anybody do anything about that?

25 MR. WASSOM: Foundation.

1 THE WITNESS: I don't remember.

2 BY MR. LALONE:

3 Q I think you said you were involved at working
4 with a catalog sometimes at Leapers?

5 A **Yes.**

6 Q You did a lot of things there?

7 A **Yes.**

8 Q And you were there from 2002 to 2011?

9 A **Yes.**

10 Q Were you involved with creating catalogs every
11 year or just some years?

12 A **The early years I involved graphic design. In**
13 **the later years they hired graphic designer and I**
14 **would help in prepare the information for optics.**
15 **Sometimes I would do a little bit of editing too.**

16 Q So who was doing the graphic work for the
17 catalogs, yourself?

18 A **In the early years. Catalog in 2002.**

19 Q In 2002, how many employees did Leapers have?

20 MR. WASSOM: Foundation.

21 THE WITNESS: I'm trying to remember.

22 I'm the first one they hired, so around the years
23 they adding more people.

24 So 2002, there's a girl called Annie
25 and -- yeah. There's some other stuff like Tony

1 and Louise. They join Leapers. I don't remember
2 exactly the time when they joined -- 2002, yeah.

3 Q You were the first Leapers' employee, right?

4 A **Yes.**

5 Q Since you were the first Leapers' employee, you
6 probably worked closely with Mr. Ding; is that
7 fair to say?

8 A **Yes.**

9 Q And Ms. Ding?

10 A **Yes.**

11 Q Looking at the 2002 catalog, isn't it true that
12 Mr. Ding did not invent any of those scopes?

13 A **Yes, I think so. Yes. Usually at the time we**
14 **just imported and sell -- re-sell.**

15 Q It's true that in 2002 Leapers was importing all
16 of its scopes, correct?

17 A **Yes.**

18 Q Isn't it true that you've never seen Mr. Ding
19 create a CAD drawing of a scope?

20 A **No. I never saw that.**

21 Q Isn't it true that in the nine years you worked
22 there, you never saw Mr. Ding design a scope?

23 A **Yeah.**

24 Q Was your office close to his?

25 A **Yeah.**

1 Q You would have seen what he was doing, right; is
2 that fair to say?

3 A **Yes.**

4 Q Exhibit 156. Please turn to page 20. Do you see
5 a scope on the left-hand side there?

6 A **Yes.**

7 Q Isn't it true that Mr. Ding did not design --
8 invent that scope?

9 MR. WASSOM: Foundation. He already
10 testified he doesn't know.

11 BY MR. LALONE:

12 Q I'll take an answer.

13 Isn't it true that Mr. Ding did not
14 invent that scope?

15 A **Yes.**

16 Q Isn't it true that Leapers did not invent that
17 scope?

18 A **Yes, that's true.**

19 Q Are you familiar with a Bushnell scope?

20 A **Not really.**

21 Q I'm going to hand you what's been previously
22 marked as Exhibit 14. It's a 2001 Bushnell
23 catalog, and I'll ask you to open this up.

24 Are you familiar with the scope company
25 called "Bushnell"?

1 Q Can you turn to the next page of Exhibit 159.

2 And we see your August 24, 2010, email
3 to Tina Ding; is that correct?

4 A **Yes.**

5 Q So it appears as though paragraphs 1 through 8,
6 these comparisons are for various performance
7 characteristics of the scope; is that correct?

8 A **Yes.**

9 Q Were these samples from Mr. Shi's factory that
10 you were inspecting?

11 A **Yes. This sample we bought from online. From**
12 **the feature we were looking at -- we assuming,**
13 **yeah.**

14 Q These scopes you were looking at that you have
15 the part numbers identified for in paragraphs 1
16 through 8, those had on them the Sniper brand; is
17 that correct?

18 A **Yes, the Sniper brand. I'm not sure if they had**
19 **the brand ...**

20 Q Isn't it true that Mr. Ding never told you that
21 his company was claiming trade dress rights in
22 scallops in the scope?

23 A **No. Yep.**

24 Q So it appears as though around the August 2010
25 time period Leapers was investigating Mr. Shi; is

1 that fair to say?

2 MR. WASSOM: Asked and answered.

3 THE WITNESS: Yes.

4 BY MR. LALONE:

5 Q And Mr. Shi cooperated with that investigation,
6 correct?

7 MR. WASSOM: Foundation.

8 THE WITNESS: Yes.

9 BY MR. LALONE:

10 Q Did Leapers use its best efforts to try to stop
11 Mr. Shi?

12 MR. WASSOM: Foundation.

13 THE WITNESS: Yes, as far as I know.

14 BY MR. LALONE:

15 Q Mr. Shi did investigate to see if any employee
16 was leaking information, correct?

17 MR. WASSOM: Objection, foundation.

18 THE WITNESS: Yes.

19 BY MR. LALONE:

20 Q And the conclusion was you found there was no
21 employee leaking information?

22 MR. WASSOM: Objection, foundation.

23 THE WITNESS: Yes.

24 BY MR. LALONE:

25 Q Let me restate that.

1 No employee was found to be leaking any
2 information from Mr. Shi's company, correct?

3 MR. WASSOM: Objection, foundation.

4 THE WITNESS: As far as I know, yeah.

5 BY MR. LALONE:

6 Q During the years you were working at Leapers, in
7 particular, the times when you were helping them
8 with their catalogs, isn't it true they never
9 identified the scallops on the scope as being
10 their trademark?

11 MR. WASSOM: Objection, foundation.

12 THE WITNESS: What do you mean
13 "identified the scallops"?

14 BY MR. LALONE:

15 Q Let me restate that.

16 You understand that plaintiffs are
17 claiming a trade dress in this case? You
18 understand that?

19 A **Yes.**

20 Q And the trade dress pertains to the scalloping
21 design on the moving parts of their scope.

22 Do you have that understanding?

23 A **Yes.**

24 Q At any time when you were working on the Leapers
25 product catalog, did you yourself ever put any

1 language in a catalog that Leapers was claiming
2 trade dress rights on scallops on the scopes?

3 A **I don't remember ever saying that.**

4 Q When did you first hear that Leapers was claiming
5 trade dress on the scallops on the scopes? Was
6 it this lawsuit?

7 A **Yes.**

8 Q The scalloping designs on -- let me rephrase
9 that.

10 In any Leapers product catalogs, did
11 they ever emphasize the scalloping design?

12 MR. WASSOM: Asked and answered.

13 THE WITNESS: No. More focused on the
14 application. How they put it on a rifle, how
15 they look, the function, try to make it present
16 nicely in a catalog.

17 BY MR. LALONE:

18 Q How it looks?

19 A **For the scope, for the scope for the rifle, looks
20 nice proportional-wise for the rifle scope,
21 hunter scope. Try to make the color look nice.**

22 Q The catalog was emphasizing the product features,
23 right?

24 A **Yes.**

25 Q The Leapers catalogs, when you worked on them,

1 were not emphasizing the scallop design, correct?

2 A **Yes.**

3 Q Isn't it true none of the advertising you had
4 ever seen while working at Leapers ever
5 highlighted or emphasized the scalloping design?

6 MR. WASSOM: Objection, vague.

7 THE WITNESS: You mean is it true?

8 It's true. Yes.

9 BY MR. LALONE:

10 Q The purpose of the scallops on the objective lens
11 is to help with the rotation of the moving part;
12 is that right?

13 MR. WASSOM: Objection, foundation.

14 THE WITNESS: Yes.

15 BY MR. LALONE:

16 Q Does it serve any other purpose?

17 MR. WASSOM: Objection, form and
18 foundation.

19 THE WITNESS: Make it easier to grab.
20 Especially in the wintertime when hunters grab,
21 they have a better feel for adjustment.

22 BY MR. LALONE:

23 Q What other parts on the scope are scalloped to
24 help the hunter with the adjusting?

25 A **Mostly the adjustment part we try to make easier**

1 to grab it, especially like Michigan, the
2 wintertime in the cold. A lot of hunters wear
3 gloves, so it makes it easier to get better feel
4 and try to make adjustment.

5 Q Can you look at the Leapers 2002 catalog and just
6 open up to one of Leapers scopes that has the
7 knurling design on it? Try to find one that has
8 a good picture of it.

9 So just leaf through and let me know
10 what page you're stopping at.

11 A Page 6 and 7.

12 Q Can you see the knurling design on pages 6 and 7?

13 A You mean the scalloping -- yeah. The adjustment
14 part, it's different -- yes, the adjustment part
15 it have that.

16 Q And has that knurling design changed on the
17 Leapers scopes since 2002?

18 MR. WASSOM: Objection, foundation.

19 THE WITNESS: Yes.

20 BY MR. LALONE:

21 Q In fact, it's changed a lot since 2002, hasn't
22 it?

23 A Yes.

24 Q In fact, the design is a lot different now than
25 it was in 2002, correct?

1 A **Yes, it's a lot different.**

2 Q Leapers isn't consistently using its knurling
3 design, is it?

4 MR. WASSOM: Objection, foundation.

5 THE WITNESS: It's different.

6 BY MR. LALONE:

7 Q Was it different in all the years that you were
8 there? Did it change at all over time?

9 A **Yes. Scope manufactured by UTG, they make it**
10 **different.**

11 Q So from 2002 to 2011, while you were at Leapers,
12 isn't it true the knurling design changed a lot?

13 MR. WASSOM: Vague.

14 THE WITNESS: Yes. It changed a lot.

15 BY MR. LALONE:

16 Q Can you describe how the knurling was changed,
17 for example, if you were to look at the 2002
18 catalog?

19 MR. WASSOM: The catalogs say what they
20 say. Do we need to go through this? Let's
21 respect our schedules here.

22 MR. LALONE: What time is it?

23 MR. WASSOM: Quarter to 12.

24 BY MR. LALONE:

25 Q I'm going to hand you the Leapers 2014 catalog,

1 and we'll just pick page 25. And we'll pick one
2 of the Leapers scopes there on page 25.

3 Isn't it true that the scalloping
4 design from 2002 is very different than the
5 scalloping design you see in the Leapers catalog
6 from 2014?

7 A **Yes.**

8 Q In fact, the design on the scallops in the 2014
9 catalog are shaped much differently, aren't they?

10 MR. WASSOM: Asked and answered.

11 Documents speak for themselves. Move on.

12 THE WITNESS: Yes.

13 BY MR. LALONE:

14 Q Can you explain to me how the shapes are
15 different from those two catalogs?

16 And, again, you're looking at the 2015
17 catalog and the 2002 Leapers catalog.

18 A **Yes. Some, like this 2002 catalog, 6220 by 56,**
19 **the adjustment is different from the other**
20 **catalog -- no, adjustment objective.**

21 Q And how are the shapes different?

22 A **The scalloping they use when they -- the**
23 **scalloping, the shape stay a lot different from**
24 **the -- in the catalog. It is easy -- more easy**
25 **to grab.**

1 Q Isn't it true that the scallops on both of those
2 show scopes that are more easily grasped?

3 A **Yes.**

4 Q The purpose of those scallops are to allow the
5 consumer to more easily grasp the scope; isn't
6 that true?

7 MR. WASSOM: Objection, foundation.

8 THE WITNESS: Yes.

9 MR. LALONE: I have no further
10 questions. I know Joe does.

11 MR. CLEVELAND: No, no. Go ahead.
12 You're doing a great job.

13 BY MR. LALONE:

14 Q Isn't it true that Leapers is not the first
15 company to use scalloped ridges on a scope?

16 MR. WASSOM: Objection, foundation.

17 THE WITNESS: Yes.

18 BY MR. LALONE:

19 Q In fact, you have a 2001 Bushnell scope in front
20 of you that has scalloped ridges on the scope,
21 isn't that correct?

22 MR. WASSOM: Objection, foundation.

23 THE WITNESS: Yes.

24 BY MR. LALONE:

25 Q And that predates when you started working at

1 Leapers, which was in 2002; isn't that correct?

2 A **Yes.**

3 Q How many other products are there out there --
4 how many other scopes are there out there that
5 have scalloped ridges on scopes?

6 MR. WASSOM: Objection, foundation.

7 THE WITNESS: I think almost all the
8 products have different scallops. All the
9 adjustment part, they have some sort of
10 scalloping.

11 MR. LALONE: I'm good. No further
12 questions.

13 MR. CLEVELAND: No questions.

14 MR. WASSOM: A couple of quick
15 follow-ups.

16 ***

17 RE-EXAMINATION

18 BY MR. WASSOM:

19 Q You've talked about whether or not Leapers has
20 claimed trade dress rights in the design.

21 If Leapers considered that design to be
22 their trade dress, would you have expected them
23 to share that information with you?

24 A **Yes. Usually they do share a lot of information,**
25 **yes. If they do, I think they should share.**

1 Every scope have adjustment part. So a
2 lot of times they give you easier to grab it and
3 especially -- I don't remember when we do --

4 I said earlier when I joined Leapers I
5 didn't have any knowledge before. So David and
6 Tina would give us introduction to products. So
7 we pick up some knowledge at that time.

8 Especially in the wintertime we need
9 easier to grab it. Hunters wear gloves and the
10 gloves make it easier -- especially up here, make
11 it easier to get a hold of that adjustment.

12 Q So you just generally picked up that knowledge in
13 the industry?

14 A **Yeah.**

15 Q If David or Tina considered that design to be an
16 esthetic design, an ornamental design, you
17 wouldn't necessarily know if they had that
18 opinion, would you?

19 MR. CLEVELAND: Objection.

20 THE WITNESS: No.

21 MR. WASSOM: Nothing further.

22 ***

23 RE-EXAMINATION

24 BY MR. LALONE:

25 Q In the nine years you worked for Leapers, did

CERTIFICATE

STATE OF MICHIGAN)
)ss.
COUNTY OF OAKLAND)

I, ANNE E. VOSBURGH, Certified Shorthand Reporter, Registered Professional Reporter, Certified Realtime Reporter, and Notary Public, do hereby certify that there came before me the aforementioned witness who was by me duly sworn to testify truthfully and was thereupon examined by oath. I further certify that said examination was reduced to writing by me, and that this transcript is a true and correct record of the testimony given to the best of my knowledge and ability.

Furthermore, I hereby certify that I am not a relative or employee of any parties involved in this case, nor am I financially interested in the outcome of the action.

ANNE E. VOSBURGH, CSR-6804

Certified Shorthand Reporter

Notary Public, State of Michigan

Leapers  **www.leapers.com**
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A Global Company Committed to Bringing You The Best-Valued Products From Around the World Spring 2002



EXHIBIT
tabbler
157

► We offer new and surplus items. ► Sales must be in compliance with local laws and regulations. ► Not all products are for sale in the US.

Leapers[™] Scopes

- Nitrogen Filled One Piece Tube Construction
Excellent shockproof, fogproof and waterproof capabilities
- Recoil-Proof Machined Housing and O-Rings
Provides a stronger seal for the reticle and lens elements
- Finest Multi-Layered Lens Coating
Provides the highest resolution and maximum light possible
- Precise 1/4 Minute Windage/Elevation Adjustment
Provides consistent accuracy time after time
- Flexible Eye Relief/Exit Pupil and Duplex Crosshairs
Quick target acquisition and great eye relief
- Mil-spec Non-Reflective Black Matte Finish
Provides surface protection and professional appearance

3rd Gen. 3-9X40 Mini

MODEL: SCP-394M

Magnification : 3X-9X
Objective Dia.: 40 mm
Tube Dia.: 1 inch
Field of View: 40'- 14.5' @ 100 yards
Eye Relief: 3-2.2 inches
Exit Pupil: 13.5-4.5 mm
Click Value: 1/4 inch (1 click @ 100 yards)
Length: 7.8 inches
Weight: 11.6 oz.



Duplex Reticle

Quick and easy target acquisition.
 Heavy posts stand out in all light conditions.
 Middle thin lines obscure nothing and centering is a snap.
 Standard on all Leapers scopes.
 Additional styles available on selected models for volume buys.



State-of-the-Art
 The ULTIMATE Variable Mini Scope

MODEL: SCP-632M

Magnification: 6X
Objective Dia.: 32 mm
Tube Dia.: 1 inch
Field of View: 17.5' @ 100 yards
Eye Relief: 3 inches
Exit Pupil: 5.6 mm
Click Value: 1/4 inch (1 click @ 100 yds)
Length: 7.5 inches
Weight: 9.4 oz.

Unmatchable in quality and value by any other competitor, this 6X32 has gained tremendous popularity. The 3rd generation scope offers a redesigned one piece tube, enhanced optical/reticle elements and strengthened locking and sealing systems. BEST BUY for first time mini scope buyers. Excellent upgrade for 4X and 5X mini scope owners. Works with sporting rifles, military rifles, .22 rifles or shotguns.

3rd Gen. 6X32 Mini



Best Buy For
 First-Time/Upgrade Buyer

One Piece Tube



Scopes

MODEL: SCP-640M

Magnification: 6X
Objective Dia.: 40 mm
Tube Dia.: 1 inch
Field of View: 18' @ 100 yards
Eye Relief: 3 inches
Exit Pupil: 7 mm
Click Value: 1/4 inch (1 click @ 100 yards)
Length: 7.5 inches
Weight: 10.1 oz.

In addition to offering the same great features of the 3rd gen. 6X32 mini, the 6X40 mini scope has bigger objective lenses providing wider field of view, faster target acquisition and better light gathering capability. It delivers the best overall performance for fixed powered mini scope. A MUST BUY for hunting/target shooting enthusiasts who love power, speed and accuracy.

3rd Gen. 6X40 Mini



**Best Overall Performance
For Fixed Powered Mini**

One Piece Tube

3-9X28 Mini AR-15/M-16

MODEL: SCP-392P

Magnification : 3X-9X
Objective Dia.: 28 mm
Tube Dia.: 34 mm
Field of View: 40'- 14.5' @ 100 yards
Eye Relief: 3-2.5 inches
Exit Pupil: 9.1-3.1 mm
Click Value: 1/4 inch (1 click @ 100 yards)
Length: 7.8 inches
Weight: 12.5 oz.

**The Most Versatile AR-15/M-16 Scope
Revolutionary with Bullet Drop Compensator!!
Comes with Flat Top Adaptor
Usable on Carry Handle and Flat Top!!**

WORLDWIDE FIRST 3X-9X variable AR-15 scope with bullet drop compensator for 100 to 500 meters usage. Designed with the tightest tolerance and finest multi-coated clear optics that deliver reliable and consistent performance. Features an integrated mount base and a separate flat top adaptor for AR-15/M-16 rifles with carry handle and/or flat top Weaver rail. REVOLUTIONARY power ring design for sensitive power changes and ease of use.



4X20/4X28 Mini AR-15/M-16



Best Buy for AR-15/M-16 Rifle

MODEL: SCP-420M / SCP-428P

Magnification: 4X
Objective Dia.: 20 mm / 28 mm
Tube Dia.: 34 mm
Field of View: 22' @ 100 yards
Eye Relief: 2.6 inches / 3 inches
Exit Pupil: 5 mm / 7 mm
Click Value: 1/4 inch (1 click @ 100 yards)
Length: 7.5 inches / 8.3 inches
Weight: 13.5 oz. / 13 oz.

Designed for AR-15/M-16 rifles. One piece aircraft-grade aluminum with scratch resistant hard-coat anodized black matte finish. Features multi-coated ultra clear optics for maximum clarity and image resolution, detachable see-through mount for carry handle, and built-in bullet drop compensator for 100 to 500 meters usage. Precise 1/4" click in windage and elevation adjustment for easy and exact zeroing. Installed in seconds without tools.



Leapers™ Full Size Scopes

Leapers Full Size A.O. Scopes - a true optical wonder, incorporating the latest technological advancement and Super-Con multi-coated optics. The crystal clear objective lens lets you see more of your target, provides a greater light transmission for dusk to dawn use, and delivers ultra-high resolution and performance. The quick-zero adjustment knobs allow for simple, precise elevation and windage adjustment in any condition, providing consistent and repeatable accuracy on the bench as well as in the field. Parallax adjustable from within a few yards to thousands of yards. Holding it all together is Leapers rock-solid one-piece tube with the finest black matte finish. Get the most scope for your money by owning Leapers A.O. Scopes.

6-24X50 Varmint A.O.

MODEL: SCP-62450

Magnification: 6X-24X

Objective Dia: 50 mm

Tube Dia.: 1 inch

Field of View: 20'-5' @100 yards

Eye Relief: 3 inches

Exit Pupil: 8.3-2.1 mm

Click Value: 1/4 inch (1 click @ 100 yards)

Length: 14.9 inches

Weight: 32 oz.

Most Scope for Your Money

Rubberized Scope Enhancer Included

One Piece Tube

6.5-20X56 30 mm Varmint A.O.

MODEL: SCP3-6520

Magnification: 6.5X-20X

Objective Dia: 56 mm

Tube Dia.: 30 mm

Field of View: 20'-5' @100 yards

Eye Relief: 3-3.2 inches

Exit Pupil: 8.3-2.5 mm

Click Value: 1/8 inch (1 click @ 100 yards)

Length: 14.2 inches

Weight: 27.5 oz.

Scopes

MODEL: SCP-394F

Magnification: 3X-9X
 Objective Dia: 40 mm
 Tube Dia.: 1 inch
 Field of View: 40'-14.5' @100 yards
 Eye Relief: 3.3-2.7 inches
 Exit Pupil: 13.5-4.5 mm
 Click Value: 1/4 inch (1 click @ 100 yards)
 Length: 12 inches
 Weight: 13.2 oz.

This 3-9X40 full size scope surpasses competitors by providing a true 3 to 9 power zoom minimum variations in point-of-impact change between power settings. Its unique one piece tube construction provides much better shockproof, fog-proof, and waterproof capabilities.

MODEL: SCP-394R

Magnification: 3X-9X
 Objective Dia: 40 mm
 Tube Dia.: 1 inch
 Field of View: 40'-14.5' @100 yards
 Eye Relief: 3.3-2.7 inches
 Exit Pupil: 13.5-4.5 mm
 Click Value: 1/4 inch (1 click @ 100 yards)
 Length: 12.2 inches
 Weight: 17.2 oz.

Exceptionally rugged, perfect for all terrains and all weather conditions! The black rubber armor makes the outside tube non-reflective, absorbs recoil, resists harsh weather and shields the finish from damage. Custom fitted rings are included to fit any standard Weaver bases (rails). Fully coated high quality lenses provides an excellent sight, bright and full of detail and contrast. A **Best Seller** well received by all buyers.

Additional Weaver Style and .22 rings with higher clearance available.

MODEL: SCP-856F

Magnification: 8X
 Objective Dia: 56 mm
 Tube Dia.: 1 inch
 Field of View: 15.8' @100 yards
 Eye Relief: 2.8 inches
 Exit Pupil: 7 mm
 Click Value: 1/4 inch (1 click @ 100 yards)
 Length: 15 inches
 Weight: 19.2 oz.

This 8 powered full size scope, configured with 56mm objective lenses, low light capability and rugged mil-spec one piece tube, delivers exceptional accuracy with high resolution and fast crosshair acquisition. The one inch tube feature guarantees absolute compatibility with any one inch rings/mounts.

Best Seller !!

Rugged !! Accurate !!

3-9X40 Full Size



A Best Buy Variable Full Size Scope

One Piece Tube

3-9X40 Rubber Armored



Custom Fitted Rings Included For Weaver Style Bases

All-Terrain / All-Weather

8X56 Full Size



Power Low Light!!

A Must-Buy for Power, Clarity and Accuracy

One Piece Tube



EUROPEAN STANDARDS

Through years of benchmark and field testing, we have adopted the most rigorous scope making standards to achieve **Accuracy**, **Clarity**, **Consistency** and **Ultimate** performance. This series is designed with the latest technological advancements and manufactured with Leapers' tried and proven design/ construction processes. They incorporate the upcoming trends and requirements for the most competitive shooters around the world. With any of these full size scope atop your rifle, accurate distance shooting has never been simpler. These scopes are loaded with the following performance enhancing features:

Main Tube: One-piece tube machined from aircraft-grade aluminum alloy with most durable hard-coat anodizing black matte finish

Construction: Robust and recoil-proof, with integrated machined adjustment turrets

Optics: Utilize top quality anti-reflective lens coating material and four layers of high-tech coating that allow an amazing 99.5 percent light transmission per lens surface.

Reticle Adjustment: Quick-zero windage and elevation knobs that are finger adjustable in guaranteed 1/4 minute clicks. In addition, the knob housing is machined, not screwed into place, to eliminate any potential leak path and improve tube integrity.

SHD-H056 56mm Sun Shade
for SCP3-2566

Model	Fov @ 100 Yds (ft.)	Eye Relief (in.)	Exit Pupil (mm)	Length (in.)	Weight (oz.)	Click Adj. (in.)
SCP-274	42.2-15.7	3-3.6	13-5.7	12.2	14.7	1/4
SCP-3940	41-14.7	3-3.3	12-4.4	12.4	15.8	1/4
SCP3-1562	45-17	3-3.6	28-7	12.2	15.2	1/4
SCP3-2566	40-10	2.95-3.1	13.2-5.6	14.6	25.4	1/4
SCP3-3942	41-14.7	3-3.3	12-4.4	12.4	17.9	1/4
SCP3-6520	20-5	3-3.2	8.3-2.5	14.2	27.5	1/8



Scopes

EXTRAORDINARY FINDS

Each year, Leapers receives numerous requests for making customized scopes in large volumes at the most competitive price. Although these scopes are not in regular production, the same disciplined process is used in design and manufacturing to achieve the optimal result in technology and quality. Our goal is to produce **durable and reliable quality scopes and mounts with unique features** that offer maximum values to our customers. The following Outreach Series of scopes are made for Clearview Investments, Inc. in the United States.

4X25 Mini Scope

The shortest high quality scope for any sporting compact rifles. Features the European style one-piece tube with precise windage/elevation adjustment turrets and diopter adjustable ocular ring. Fully nitrogen filled tube is sealed with heavy duty O-rings. An excellent choice for any compact rifles.

4X28 Mini Special Edition

The 4X28 Mini Scope with its superior optical system and extremely rugged design sets a standard for later compact scope designs. Many nostalgic customers have fond memories of this scope and repeatedly asked us to stock the item. We finally located and assembled the original designers and craftsmen to reintroduce this special edition.

3-9X32 Full Size Scope

One of the most popular scopes in the world. A universal scope giving close-in (brush) shooting at 3X, normal range at 4-6X and 7-9X for big games. Best deal on a serious scope anywhere!

Outreach Red Dot Scope

The Electronic Red Dot Sight is engineered on the cutting edge of technology with a remarkable and flexible dot, brightness settings and precision-click windage/elevation adjustment systems. They allow you to effortlessly concentrate with two eyes open on the reticle and the target, and find your targets with amazing speed and accuracy. An excellent addition to your pistols, rifles, shotguns and bows.

Model	Fov @ 100 Yds (ft.)	Eye Relief (in.)	Exit Pupil (mm)	Length (in.)	Weight (oz.)	Click Adj. (in.)
SCP-425M	28	3	6.2	6.6	7	1/4
SCP-428M	28	3	7	6.7	7	1/2
SCP-432F	28.8	3.4	8	11	13.4	1/4
SCP-392F	32.7-11.6	3.0-3.7	12.2	12.2	14.1	1/4
SCP-D03	45	Flexible	Flexible	7	6	1/2



SCP-425M 4X25 Mini Scope



SCP-428M 4X28 Mini Scope



SCP-432F 4X32 Full Size



SCP-392F 3-9X32 Full Size



SCP-D03 Red Dot Scope



Leapers™ Mounts

AR-15 Scope Mount

MNT-990 Deluxe AR-15 Multi-Functional Tactical Mount

Weaver style mount with deluxe tactical Weaver style rings. One piece body, with upper/lower sections, fits on carry handle with plenty ring slots to mount scope, laser and flash light.



MNT-993 AR-15 Military Tactical Mount

Military specs. Fits on carry handle. Takes standard Weaver or Stanag rings. See thru design.



MNT-991 AR-15 Weaver Style Mount

16 slots to take Weaver rings and accessories. See thru design. Fits on carry handle.



MNT-996 AR-15 Flat Top Mount

Attaches to any Weaver rail. See-thru design. Accepts AR-15 military style scopes. Side screws and locking plate design. No need to remove scope to remove mount.



MNT-992 AR-15 Weaver Style Mount

11 slots to take Weaver rings and accessories. See thru design. Fits on carry handle.



MNT-995 AR-15 Riser Mount

Fits flat top AR-15, FAL and others of Weaver base. Side screws and locking plate design. No need to remove scope to remove mount. 13 slots for scope ring adjustment.



MNT-950 AR-15 Carry Handle

Fits on AR-15 style rifles as a carry handle and a rear sight system.



Mounts

FN/FAL Scope Mount

MNT-980 Weaver Mount with Rings
Fits FN/FAL. Longer weaver see-thru rail.
Optimum height/width clearance for
all popular scopes.



MNT-981 Deluxe FAL Military Mount
Military style. Takes Weaver rings with 21 slots for
accessories. Optimum height/width clearance for all popular
scopes.



MNT-982 Deluxe FAL Military Mount

Second generation military style FAL mount. More modern &
lightweight design. Accepts stripper clip. Takes Weaver rings
with plenty slots for accessories. Optimum height/width
clearance for all popular scopes.

Forthcoming

SKS Scope Mount

MNT-640 SKS Hi-profile Integral See-thru Mount
Replaces receiver cover. Complete with integral 1" rings.
Wide see-thru view of iron sights.
Zero-hindrance to stripper clip loading.



MNT-642 SKS Low-profile See-thru Mount
All steel construction. Raised Weaver style base.
Replaces receiver cover. Includes 1" rings.



M1 Carbine Scope Mount

MNT-M1C M1 Carbine Mount
Fits all models. Easy to install.
No gunsmithing required.
Attach scope using standard Weaver rings.



M14 Scope Mount

MNT-914 Deluxe M-14 Sniper Mount
Military specs. Fits M14 rifles.
Top rails locks into charger guide dovetail.
Accepts Weaver style rings.
Allows use of iron sight.



Trilux Scope Mount

MNT-TL16

All steel construction. Fits on M-16 carry handle. Special top rail to accept the famous Trilux scope.

MNT-TL01 - Forthcoming

Designed to accept the famous Trilux scope. Fits on any Weaver style base. Side screws and locking plate design.

Galil Rifle Scope Mount



MNT-GL01

Military specs side rail design to fit on Israel Galil rifle. Accepts M-16 military style scopes. Quick release lever latch to firmly secure mount. Most friendly design for battle fields.



AK Scope Mount

MNT-972 Weaver Side Rail Mount

Military specs deluxe side rail mount with Weaver base. Fits all AK style side rails. Takes standard Weaver style rings with 11 slots for accessories. Accepts full or compact length rifle scopes. Allows use of open sights.



MNT-971 AK Side Rail Integral Mount

Deluxe side rail mount with built-in integral 1" rings. Fits all AK style side rails. Allows use of open sights.



MNT-970 Weaver Style Mount with Tactical Rings

Stabilizer design of receiver cover to ensure locking and prevent rocking. Longer Weaver see-thru rail for additional mounting positions. Optimum height/width clearance for all popular scopes.



Tactical Rings

Tactical Rings Great looking and excellent quality rings that trim extra weight and remain rock-solid. Made from strong aluminum alloy and coated with black anodized finish. Solid thumbscrew (with stabilizer pin) allows fast on/off mounting that guarantees return to zero after scope reinstallation. Optimal 10+mm height clearance fits all popular scopes.

RG14W-25C 1" Std Weaver Rings
14mm width, 2 hex screws per ring.
Fits 1" tube scopes and standard
Weaver mounts.



RG14D-25C 1" Std .22 Rings
14mm width, 2 hex screws per ring.
Fits 1" tube scopes and .22 mounts.



RG14W-30C 30mm Std Weaver Rings
14mm width, 2 hex screws per ring.
Fits 30mm tube scopes and standard
Weaver mounts.



RG20W-25C 1" Deluxe Weaver Rings
19-20mm width, 4 hex screws per ring.
Fits 1" tube scopes and standard
Weaver mounts.



RG20D-25C 1" Deluxe .22 Rings
19-20mm width, 4 hex screws per
ring. Fits 1" tube scopes and .22
mounts.



RG20W-30C 30mm Deluxe Weaver Rings
19-20mm width, 4 hex screws per ring.
Fits 30mm tube scopes and standard
Weaver mounts.



Airsoft Kingdom



THE CLASSIC COMBAT HANDGUNS Powerful and accurate target guns. Life-size pistols with removable magazines for 22-25 pellets. Designed to scale, even with safety and magazine release. Great look and feel. Fires airsoft 6mm 0.12g pellets and approximately 242 f.p.s. No CO2 cartridges or batteries required. Simply pull the slide back to cock and load. Be safe and have fun!

Call for the latest inventory!!



THE ELECTRIC MINI MACHINE GUNS Approximate 1:3 scale. Battery operated and full auto. Fires airsoft 6mm 0.12g pellets. Best mini-electric guns at a fun, affordable price. Fires approximately 250 pellets per minute with a firing range of 20 meters. All the fun of shooting machine guns without the noise and expense. Requires 4 "AA" batteries (not included). Approximately 70 pellets load in the top of the gun (300 pellets for Model 606).



6mm 0.12g BB Pellets



750 Count



2000 Count



5000 Count

Must be 18 years or older to purchase. Wear safety glasses and follow all safety measures as you would with any firearm. Leapers is not responsible for any property damage or personal injury resulted from inappropriate or unintended use of airsoft products.



Airsoft

THE FULL SIZE SPRING GUNS Fires heavier 0.2g airsoft BB pellets. Each model has its unique features and design. For the exciting pumping action, the powerful long-range hit, the versatile accessories, or the attractive look and feel, take your pick and get yourself some great shooting fun!



AIRSOFT ACCESSORIES

0.12g Pellets



SOFT-T01 Sticking Target



PVC-H168
Universal Leg
Holster



Spare Magazines



PVC-MP2
Dual Pistol
Magazine Pouch

0.2g Pellets



SOFT-T02 Mesh Trap Target



PVC-524
Tactical Vest/Pouch

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Survival Tools

The experiences, traditions and craftsmanship of sword-making have been passed on from generation to generation for over 2,700 years in our sword factory. Designed to meet the requirements of professional martial artists! These swords are working collectibles with ingenious design and hand forged blades, using natural material in their construction.



Model: SW-SMB41&27

Samurai Sword

Samurai Swords are handcrafted under the supervision of the "sword masters". Made with quality steel and replicated in exact details of the famous historical battle weapons. Brass guard and cord wrapped handle with pommel cap and stainless blade. Intricate dragon design on the handle and hilt. Classic, simple design used by soldiers for centuries. This handsome set includes one 41" sword and one 27" sword.



Model: SW-TWN26

Twin Sword

Modern version of the early fighting weapons of the Chinese. Expertly hand carved from beautiful blond hardwood with handle that conceals the blade. Detailed carving of dragons in gold on the handle. Twin Sword measures 26" in length.



Model: SW-DCA38

Dragon Sword Cane

Intricately handcrafted blond hardwood. This 38" cane houses a 20" steel blade. The craftsman shows off his talent with dragons carved from head to tip, even including a carved ball inside the dragon's mouth. Brass cap at the tip.

Survival Knives- All made with highest military quality. Heat-treated, 1/4" thick 440C stainless steel blade. Complete with polymer handle, sharpening stone, universal saw, wire cutter, screw driver, sheath with quick detach belt keeper and a removable magazine pouch. These field knives are very versatile and have proven to be most useful to all outdoor activities.



Outdoor Gears

RS-500 Super Bright Rechargeable Spotlight

Compact, hand-held spotlight provides up to 10 times the power of most automobile headlights. Impact and weather resistant housing. Bright, 500,000 candle power beam carries up to one mile. One touch switch design. Provides up to 60 minutes of continuous operation. Built-in sealed lead-acid rechargeable battery. Recharge in vehicle (12 hours) with 12-volt car cord, or at home (15 hours) with ac adapter (both included).



Sterno Folding Stove - The ultimate lightweight folding stove to use with canned heat like Sterno. Holds flat for easy backpacking. Sturdy enough to hold heavy pots. Holds a seven ounce can of Sterno or other canned heat products.



Personal Stove - Perfect packers or emergency stove. Ultra-lightweight and folds to card deck size. Uses Trioxane fuel bars. Great to cook, heat, warm or sterilize. Fits in your shirt pocket and ensures your survival.



Solar Survival Radio - Absolutely required for emergencies and survival. This is an AM/FM radio with flashlight and emergency signal. Can be powered by four different sources. Uses standard "AA" batteries, DC charging, store up power by exposure to solar or room light, or hand crank to store a charge. No matter where you are or what happened, you can follow news, have lights for direction and many other benefits. A MUST for travelers, homeowners, survivalists or folks who just have their electrical services interrupted. Excellent quality, lightweight and portable.



Tactical Rifle Case

These heavy duty cases are built with highest quality to provide the best possible protection for your rifle. Custom designed to fit popular assault rifles. Each case is heavily padded with a closed cell foam, providing over two inches of protection. The cases are so well padded, they will float with the gun in it! Features include a reinforced one-piece wrap around handle, carrying sling sewn to case, soft interior lining, and 5 magazine pouches. Holds weapon with scope. A lockable zipper is located on the top of each case.



PVC-DC30 30" Rifle Case

Fits Retractable Stock for UZI, AK-47, HKA3, MP5 and Styer Aug Semi Auto without flash hider.



PVC-DC38 38" Rifle Case

Fits AKM, MAK-90 and HK-94.



PVC-DC42 42" Rifle Case

Fits AR-15, Mini 14, M16, HK-91 and HK-93.



PVC-DC46 46" Rifle Case

Fits FN-LAR/FAL, FN-49, Sig, M-14 and M1 Garand.



PVC-SK43 43" SKS Case

The best quality SKS gun bag ever made. Designed to hold the SKS Rifle, Carbine or Folding Stock. Sturdy carrying handle sewn all the way around. Velcro side pocket allows you to store an extra magazine, cleaning accessories or ammunition. Will also hold long rifles such as the MAK-90, AK-47, M1-Carbine, Ruger 10/22 and others.



Bags and Pouches

**Heavy
Duty**



Made to military specifications



Robust and durable material and sewing



Ideal for carrying extra magazines or ammos



PVC-P0602
Dual Rifle
Magazine Pouch



PVC-H168
Universal
Leg Holster



PVC-MP2
Dual Pistol
Magazine Pouch



PVC-B571A
Black



PVC-B571B
OD Green



NYL-ZA950
PVC Web Belt



PVC-524
Tactical Vest/Pouch

- ▶ Padded shoulder straps
- ▶ 4 magazine pouches, 5 utility pouches
- ▶ Velcro closure
- ▶ Quick Release Buckle System
- ▶ 35"X5" heavy duty zippered, concealed belt pouch



PVC-301
Chest Pouch



PVC-M3200
Shooter's Bag



PVC-523
Tactical Backpack



Chest Pouch

Chest Pouch



- ▶ Padded shoulder straps
- ▶ 4 magazine pouches
- ▶ 2 grenade pouches
- ▶ Quick Release Buckle System
- ▶ Velcro/Snap belt loop



PVC-546
Tactical Vest/Pouch



Accessories

Leapers has been in business since 1992. One of our mottos is to listen carefully to the voice of the customer. Over the years, customer feedback has led us to devote our resources to identifying and supplying a variety of hard-to-find quality accessories for different firearms at the most affordable prices. In this section, to aid you in selecting the right products, we organize these accessory items by their firearm applications and present them with references to our scope and mount offerings.



RB-A450 Carbine Stock



RB-A487
Carbine Cheekpiece



RB-A030
Shorty Carbine Butt Pad



TL-A041 Cleaning Kit



TL-A050 Mag. Clamp



TL-EX223
.223 Shell Extrator



RB-AF01 Mag Follower



RB-A005 AR-15 Buffer



MNT-16AD1 Blank Adapter



RB-16FDL
AR-15 Handguard with Liners



RB-16FDS
AR-15 Carbine Handguard with Liners



MNT-TL16
AR-15 Trilux Mount



Applications



MNT-990
AR-15 Multi-Functional Mount



MNT-993
AR-15 Military Tactical Mount



MNT-996
AR-15 Flat Top Mount
Also works on Weaver Rail for
AN/PVS4 Night Vision



MNT-950
AR-15 Carry Handle

Recommended Scope



3-9X28



4X20



4X28



3-9X40 Rubber Armored



MNT-991
AR-15 Weaver Bar Mount (See-thru)



MNT-992
AR-15 Weaver Tactical Mount



MNT-995
AR-15 Riser Mount





Applications



RB-MCF1
FAL Metric Mag. Dust Cover

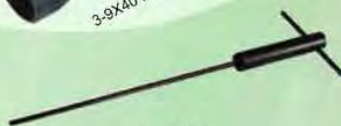
Recommended Scope



TL-ZA160
.308 Magazine Clamp



MNT-981
Deluxe FAL Military Mount
(Next Generation MNT-982 Forthcoming)



TL-F001
FN/FAL Stock Tool



TL-3202
7.62 NATO Stripper Clip (.308)



MNT-980
FN/FAL Weaver Mount
with Tactical Rings



M1 Carbine, M1 Garand, M14/Mini-14



RB-MC040
M1 Carbine Butt Pad



TL-MC120
M1 Carbine Magazine Clamp



MNT-M1C
Deluxe M1 Carbine Mount



TL-MG10
M1 Garand Clip



RB-MGR200
M14 Butt Pad



MNT-914
M14 Sniper Mount

Recommended Scope



SCP-RG440
Mini-14 Sight Tool



TL-RGR445
Mini-14 Stripper Clip Guide



MNT-TL16
AR-15 Trilux Mount
(Weaver Trilux Scope Mount Forthcoming)



MNT-GLAD1
Galil Blank Adaptor

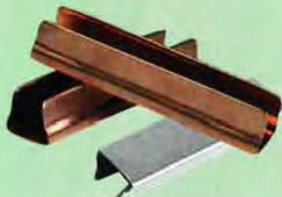


MNT-GL01
Galil Rifle Scope Mount



RB-RG60
10/22 Mini-14/30 Butt Pad

RB-RGR150
10/22 Extended Magazine Release



TL-MS01/TL-MS02
Mosin Nagant Stripper Clip



TL-M119
Bolt Handle



Bi-pods



TL-BP02
Mil-spec Metal Bipod, Short



TL-BP01
Mil-spec Metal Bi-pod, Long



TL-BP05
Universal Metal Clamp-on Bi-Pod



TL-BP16
Mil-spec Universal Clamp-on Bi-pod
with Wire Cutter and Tools



TL-BP67
Universal Metal Bi-Pod
Clamp on Barrel or Mount on Swivel Stud



TL-BP70
Zytel Clamp-on Bi-Pod

Applications

Sun Shades



SHD-S32
32mm Sun Shade



SHD-S40
40mm Sun Shade



SHD-S41
40mm A.O. Sun Shade



SHD-H056
56mm Sun Shade



SHD-H044
Sniper 3" Sun Shade

Magazine Loaders



TL-ZA165
Mag Loader for .22 Pistol



TL-ZA170
Mag Loader for
9mm Single/Double Stacked Mags &
Single Stacked .45 Auto Mags



TL-K060
AK/MAK Mag. Speed Loader

Other



LOCK-L01
Cable Gun Lock



PL-HDF1
Mil-spec Handcuffs



KNF-ZA355
Zytel Sticker Knife



TL-CL99
Expandable Cleaning Kit



RNG-330
Dummy Grenade Head



TL-ZA235
Brass Driving Mallet





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A Global Company Committed to Bringing You The Best-Valued Products From Around the World

Spring 2002



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Military and Law Enforcement Action Figures

Leapers, Incorporated, headquartered in Michigan, U.S.A., has been in the business of supplying shooting, hunting and outdoor gears since 1991. We set un-compromised high standards for all of our business operations. Our goal is to provide a total solution for any line of products we offer. We pay close attention to industry trends and customer feedback, with a focus on making the best-in-class niche products available for hunting, shooting and outdoor enthusiasts like you. Many of you have contacted us in the past to let us know what you need in your particular situations or how our products can be further enhanced. We thank you very much and ask for your continuous support and feedback in the future.

► We offer new and surplus items. ► Sales must be in compliance with local laws and regulations. ► Not all products are for sale in the U.S.

From: Joy Xu
To: 'Tina Ding'
CC: 'David Ding'; 'John Xie'; 'Eric Wang'; 'Adam Yan'
Sent: 8/17/2010 10:47:10 AM
Subject: RE: SCP-6245AOMDLTS - pirate copy? added text
Attachments: Re: SCP-6245AOMDLTS - pirate copy? added text



Tina,

You are right that we are not involved. In his previous note, he mentioned that retail box has -

- 1, UTG 6-24x50 FULL SIZE AO SCOPE text on box.
- 2, Picture of LEAPER scope on the box.
- 3, Box also includes Manual from LEAPERS.

Those information catches my attention. I check the website, the item location is in Shanghai ,China. I know there are lots copy-cat in China, I think we should pay more attention to protect our product, plus there no hurt to ask for more information. I received reply from customer in the morning, please see attached. This is indeed our SCP-6245AOMDLTS, seller sell it as centerpoint brand. The package is old version package.

I check seller's store, those are what I found for your reference -

1. Scope <http://www.tradera.com/auction/viewitempage.aspx?aid=116787376>
2. Scope <http://www.tradera.com/auction/viewitempage.aspx?aid=116788044>
3. Bipod <http://www.tradera.com/auction/viewitempage.aspx?aid=116767681> (very smellier like BP08S)

Thank you,



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THE BEST NEVER REST

Joy Xu

Leapers, Inc

32700 Capitol Street, Livonia, MI 48150

T: 734-542-1500; Ext.225. F: 734-542-7095

From: Tina Ding [mailto:tding@leapers.com]
Sent: Tuesday, August 17, 2010 9:37 AM
To: 'Joy Xu'
Cc: 'David Ding'; 'John Xie'; 'Eric Wang'
Subject: RE: SCP-6245AOMDLTS - pirate copy? added text

Where was it shipped from?

If I recall correctly from what I reviewed yesterday, he provided a link to a Centerpoint scope? If so, Centerpoint handles their own warranty support. We are not involved.



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Tina Ding

tding@leapers.com

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Livonia, MI 48150

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F: 734-542-7095



LEAPERS013608

Confidential Information

<http://www.jsramsbottom.com/categorylist/riflescopes-jsr-optics/>

If you would like his assistance to get some of the JSR products to identify the source. You can pick a few and let me know, I will also discuss with David/Tina further on how to proceed. Thanks much!



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Davy Lin
Leapers, Inc.
32700 Capitol Street
Livonia, MI 48150
(T): 734-542-1500 Ext: 218
(F): 734-542-7095

From: John Xie [mailto:hxie@leapers.com]
Sent: Thursday, November 11, 2010 3:59 AM
To: 'Tina Ding'
Cc: 'David Ding'; 'Davy Ling'; 'Tom Zhu'; 'Joy Xu'; 'Peter Ding'; 'Stella Hou'; 'Steven Yu'
Subject: RE: no! concealed protective marking

Tina,

We brought this issue up to Mr. Shi on October when David and me visited WY. However Mr. Shi denied completely and said many small scope companies at NT areas live on producing counterfeit products. It is difficult to stop this practices. A few opinions

1. There are many website selling scopes (all different brand) at China. It is obvious that there is an underground market for this items.
2. Is it possible that we setup an website as an official vendor outlet at China. We announce it on our website and publish a note (similar to WHT's) to have buyer aware of the counterfeit. Buyer would always want to buy from the official vendor. However, I am not sure if there is any concern to sell scope at China. It is also difficult to setup a price that will not affect our oversea selling price when dealer know we have additional room to negotiate.

Thanks,

John Xie
Leapers, Inc.

From: Tina Ding [mailto:tding@leapers.com]
Sent: Thursday, November 11, 2010 12:36 AM
To: 'Steven Yu'; hxie@leapers.com
Cc: 'David Ding'; 'Davy Ling'; 'Tom Zhu'; 'Joy Xu'
Subject: RE: no! concealed protective marking



My reaction –

- 1) I agree with your speculations about what WHT's doing. I do not have any knowledge about such marking.

- 2) John X, please give this priority to think about some possible way to distinguish our scopes from counterfeit products.



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THE BEST NEVER REST

Tina Ding

tding@leapers.com

Leapers, Inc.

32700 Capitol Street

Livonia, MI 48150

T: 734-542-1500 X201

F: 734-542-7095

From: Steven Yu [<mailto:stevenyu@leapers.com>]

Sent: Wednesday, November 10, 2010 10:45 AM

To: 'Tina Ding'; David Ding; 'Davy Ling'; 'Joy Xu'; hxie@leapers.com; 'Tom Zhu'

Subject: FW: no! concealed protective marking

Hello Tina and David,

Please see the issue below reported by Artemida. The warning message in World Hunting Technology's website is translated as follows.

Riflescopes Leapers (USA)
WARNING!

DEAR BUYERS, company WHT ru warn you!

The cases of supplies to the Russian market scopes, mounts and other products with the brand LEAPERS directly from the "gray" dealers from China. As a rule, "gray" products are collected in small cooperatives in China from the defective component (written off in the recycling of plant LEAPERS in Kantgona) specifically for export to Russia, CIS countries, Ukraine, Baltic States and South-East Asia. Outwardly, these products and their packaging almost indistinguishable from the original, but the price may be lower in 1.5-2 times. Correspondingly the quality and reliability of these products is extremely low, and warranty and post-warranty repair, they can not be due to the applied technology assembly. Beware of imitations!

Since 2009, all the sights LEAPERS officially delivered to Russia will have a special hidden protective marking.

It seems that the counterfeit of Leapers scopes are serious enough in Russia so that WHT would make such a statement on their website. But I am not sure why they say there is a concealed protective marking on our products. Although it's possible that WHT apply their own markings after receive our scopes, maybe Tina or John would know better.

This also tells us that we need to take actions to the counterfeit makers in China if we haven't already done so.

Steven Yu

stevenyu@leapers.com

Leapers, Inc.

32700 Capitol Street

Livonia, MI 48150

Tel: 734-542-1500 ext. 230

Fax: 734-542-7095

[Click to see UTG New Products!](#)

From: Elena Quarta Ltd. [<mailto:elena-quarta@yandex.ru>]

Sent: Wednesday, November 10, 2010 10:02 AM

To: 'Steven Yu'

Subject: no! concealed protective marking

Confidential Information Subject to Protective Order

LEAPERS014626

Confidential Information

Dear Steven,

In the web site of one of your dealers, World Hunting Technology Ltd. in particular, it is written that all Leapers products have concealed protective marking because cases of "grey" Leapers products have become more and more often in the Russian market. Because of this statement in World Hunting Technology Ltd. web site (here http://wht.ru/shop/catalog/Leapers_USA/mount_Leapers/) many our customers ask where this so called concealed protective marking in the products we sell. Please send/email us an official letter from your company in your company sheet that there is no such marking and has never been.

Thank you in advance!

Best regards,
Elena Kromova
Quarta Ltd
+7 812 4951298
+7 812 3371197
elena@quarta-hunt.ru
elena-quarta@yandex.ru
Skype: elena.kromova
<http://www.quarta-hunt.ru>
Russia, Saint-Petersburg

_____ Information from ESET NOD32 Antivirus, version of virus signature database 5607 (20101110)

The message was checked by ESET NOD32 Antivirus.

<http://www.esetnod32.ru/ml>